



# San Francisco Water Power Sewer

Services of the San Francisco Public Utilities Commission

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*Sent via electronic mail to [Johnson.Kathleen@epa.gov](mailto:Johnson.Kathleen@epa.gov)*

April 29, 2016

Ms. Kathleen Johnson, Director  
Enforcement Division  
United States Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Dear Ms. Johnson,

This letter transmits information on excursions from San Francisco's combined sewer collection system that occurred between October 1, 2011 and March 31, 2016, pursuant to your Request for Information letter of February 16, 2016 and your letter of April 12, 2016, revising certain due dates for this information. The records which comprise the monthly report of excursions and private property backups<sup>1</sup> for February 2016 and March 2016 are also included in this submittal.

Attached please find two excel workbooks, one for excursion records from October 2011 through September 2012 and one for excursion records from October 2012 through March 2016. The first tab of each workbook contains a table describing the information provided and the second and third tabs contain the excursion records responsive to the Request for Information.

San Francisco's combined sewer system provides significant environmental benefits because it treats stormwater. San Francisco's combined sewer system, moreover, provides additional protection because it is designed to prevent excursions from reaching the Bay and ocean, including during extreme storm events. The excursion information the EPA has requested is more consistent with reporting requirements for a separate system than a combined system. Some of the information requested goes beyond what our NPDES permits require. While we have and will continue to work with the EPA's request for information about our collection system, we reiterate that the applicable standards for our collection system are articulated by the CSO policy (not those of a separate sewer system), and we are in compliance with them. Thank you for providing the requested information that was shared with us yesterday regarding the tracking and monitoring examples from other CSO communities. We will review the information and will also continue our own survey of other CSO communities to better understand their excursion monitoring practices.

While we have endeavored to provide information responsive to the request, it is important to note that our system for capturing field data has been evolving rapidly. Field crews were still utilizing 3x5 cards (see an example provided as Attachment A) to

<sup>1</sup> As discussed during the meeting with EPA staff on April 8, 2016, private property backup excursions are not separately tracked, so records which may have involved a private property backup are included with the other excursion records.

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General Manager



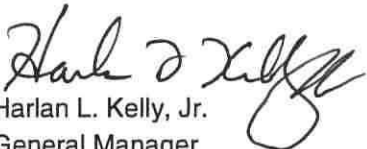
record their work in 2013. In the three years since then, field staff have gone paperless with real time computer work processing.

In the meeting that took place on April 8, 2016, EPA staff requested that when transmitting the excursion data contained in this submittal, the SFPUC provide information about how the excursion records were generated. As discussed extensively during that meeting, the SFPUC utilizes MAXIMO for its collection system work orders and asset management. The excursions database is created by querying MAXIMO. For an excursion record to exist in MAXIMO, a work order must have been generated, and to be retrieved for the excursions database, the work order must also identify the event as an excursion. However, as discussed in the April 8 meeting, excursions caused by rainfall exceeding the system capacity often do not generate work orders. There are several reasons for this, including a lack of service requests for rain-caused excursions, and, since rainfall-caused excursions generally are of short duration, they are not often field verified by staff.

We appreciate discussing these issues with you and your staff and are looking forward to our upcoming meeting on May 27, 2016. Please do not hesitate to contact SFPUC staff member, Laura Pagano, with any questions or concerns at 415-554-3109.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those who manage the system or are directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations under the Clean Water Act and 18 U.S.C. § 1001.*

Sincerely,

  
Harlan L. Kelly, Jr.  
General Manager  
San Francisco Public Utilities Commission

cc: Jared Blumenfeld  
Alexis Strauss  
Nancy Woo  
Tomas Torres  
Eric Magnan  
Bruce Wolfe  
Tom Mumley  
Lila Tang  
Jessica Watkins  
Michael Carlin  
John Roddy

## **ATTACHMENT A**

Example of 3x5 card capturing collection  
system field data

<b>SERVICE CALL</b>		SC ID# 582406	DATE & TIME: 8/28/09
ADDRESS/LOCATION: 929 OAK St. N.E.			
CROSS-STREETS/LOCATION DETAILS: Pierce + Scott			
SOURCE: 311 call center	ZIP:	ZONE:	CALLBACK? <input type="checkbox"/>
TYPE: M/S <input checked="" type="checkbox"/> S/S <input checked="" type="checkbox"/> C/B <input type="checkbox"/> MH <input type="checkbox"/> OTHER <input type="checkbox"/>			DISPATCHED TO: 8:40 AM
URGENT: <input type="checkbox"/> WHY?			TIME PROMISED: 9:18 AM
JOB DESCRIPTION / INSTRUCTIONS / ON-SITE CONTACT / PHONE NUMBER(S):			
ok. SB + M/S			
Residential			
US MH ID#:	DS MH ID#:	CB ID#:	

Oak	929	8/28/09
*****DO NOT WRITE ABOVE THIS LINE*****		
FOLLOW-UP ACTION NEEDED? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> URGENT <input type="checkbox"/>		NEXT RO/SC ID#:
CREW REPORT & RECOMMENDATION: Normal level in trap. vent by garage (20' back from curb) backed-up. 7449 was here yesterday. private plumber here to check / ext. col. washed down area, disinfectant.		
ADD RECOMMENDATION TO PM SCHEDULE? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		FREQUENCY:
DATE RESPONDED: 8/28/09	TIME: 9:18 AM	FILE:
SIGNATURE: Brennan		